

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AMANDA SCHNOOR, WILLIAM PACKER,
AND CLINT YOUNGER,

Defendants.

8:21CR210

MEMORANDUM OF RULE 17.1
PRETRIAL CONFERENCE

This matter came before the court on October 27, 2022, for a pretrial conference pursuant to Federal Rule of Criminal Procedure 17.1. The government was represented by Kimberly C. Bunjer, Assistant United States Attorney; Defendant Amanda Schnoor was represented by Michael Bianchi; Defendant William Packer was represented by Jason Troia; and Defendant Clint Younger was represented by James Regan.

The government requested that the following evidentiary issues related to trial be addressed by the parties and the court:

1. Lab Results for Seized Narcotics. The government proposes a written stipulation that the suspected controlled substances were sent to a forensic laboratory to be weighed and tested to determine their chemical composition; that forensic chemists performed such tests; that such tests and analyses performed are generally accepted within the field of forensic chemistry.
2. Seized Narcotics. The government proposes utilizing a single agent from Kansas to testify to the narcotics seized and submitted into evidence by officers. A single agent would negate the need for multiple agents to testify as to links in the chain of custody and foundation.
3. Title 21 United States Code, Section 851 Enhancement. The government proposes a written stipulation between the parties that Defendant Amanda Schnoor has been previously convicted of a “serious drug felony,” as that term is defined by statute, for which he served more than 12 months imprisonment and from which Defendant was released within 15 years of the offenses alleged in Count I of the *Superseding Indictment*. Such a stipulation would promote judicial economy without the need for the government to present a witness(es) to testify about Defendant’s prior incarceration or his prior conviction.

Counsel for each of the defendants expressed an expectation that they will stipulate as requested to issues 1 and 2 at or before trial and the government will prepare a written stipulation for review and execution. Counsel for the defendant, Schnoor anticipates a stipulation to issue 3 as requested at sentencing upon conviction. Counsel for the defendant, Packer will be filing a motion to continue trial for purposes of additional discovery and ongoing plea negotiations. The government and co-defendants do not oppose a continuance and tolling of the speedy trial clock.

Counsel for the Government anticipates three trial days for its case in chief and represents that five trial days in total is sufficient for this matter to be heard.

Dated this 27th day of October, 2022.

BY THE COURT:

s/Michael D. Nelson
United States Magistrate Judge